

FILED
OCT 13 2021

**U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS
SUPPRESSED**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTILE HUGHES-DILLON,

TAJUAN WILSON, and

LARENZO SMITH,

Defendants.

4:21CR00563 MTS/NCC

No.

Counts I & II

Count I

Count I

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning on an unknown date and continuing for a period of time, including up to the date of this Indictment and after, with the exact dates unknown, within the Eastern District of Missouri and elsewhere,

**CHRISTILE HUGHES-DILLON,
TAJUAN WILSON, and
LARENZO SMITH,**

the defendants herein, did knowingly and intentionally conspire, combine, confederate and agree together with other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1);

All in violation of Title 21, United States Code, Section 846.

COUNT II

The Grand Jury further charges that:

On or about September 24, 2021, in St. Louis County and within the Eastern District of Missouri,

CHRISTILE HUGHES-DILLON,

the defendant herein, knowingly possessed a firearm, knowing he had previously been convicted in a court of law of one or more crimes punishable by a term of imprisonment exceeding one year, and the firearm previously traveled in interstate or foreign commerce during or prior to being in the defendant's possession.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Sections 841(a)(1) or 846, as set forth in Count I, the defendants shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violations, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Count I.

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g)(1), as set forth in Count II, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violation.

4. Specific property subject to forfeiture includes, but is not limited to, the following:

- a. 8173 Martin Luther King Boulevard, St. Louis, Missouri 63140;
- b. 838 Rolwes Avenue, St. Louis, Missouri 63135;
- c. Red 2014 Jeep Grand Cherokee, MO license plate: GA3H9R, VIN: 1C4RJFDJ4EC368035;
- d. Red 2004 Chevrolet SS Pickup Truck, MO license plate: 2FEH70, VIN: 2GCEK19NX41148932;
- e. 2016 Kenworth T60, MO license plate: 52KR5T, VIN: 1XKYDP9X5GJ121986;
- f. 2015 Refrigerator, KS temporary license plate C826856, VIN: 1UYVS2532GU452101;
- g. FN Herstal make, 509 model, 9mm caliber firearm; and
- h. Miscellaneous Magazines and Ammunition.

5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

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